

FILED

2018 FEB 28 PM 4:06

CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
TOLEDO

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
WESTERN DIVISION

UNITED STATES OF AMERICA,

) INDICTMENT

Plaintiff,

) 3:18CR103
CASE NO.

v.

) Title 18, United States Code,
MARK ALEX SIMON,
SARAH MARIE ALBERTS,
AARON KUNS,
BENJAMIN STALETS,
1028(a)(1), 1028(a)(2),
1028(a)(3), 1028(a)(5) and 2

Defendants.

) **JUDGE HELMICK**

) **MAG. JUDGE JAMES R. KNEPP II**

COUNT 1

The Grand Jury charges:

From on or about June 18, 2013 to on or about February 6, 2018, in the Northern District of Ohio, Western Division and elsewhere, the Defendants, MARK ALEX SIMON, SARAH MARIE ALBERTS, AARON KUNS and BENJAMIN STALETS, did knowingly and without lawful authority, produce one or more identification documents, authentication features and false identification documents, to wit: false identification documents which appeared to be drivers licenses and personal identification cards issued by the States of Ohio, Michigan and Utah, which production and use affected interstate and foreign commerce.

ORIGINAL

All in violation of Title 18, United States Code, Sections 1028(a)(1) and 2.

COUNT 2

The Grand Jury further charges:

From on or about June 18, 2013 to on or about February 6, 2018, in the Northern District of Ohio, Western Division, and elsewhere, Defendants, MARK ALEX SIMON, SARAH MARIE ALBERTS, AARON KUNS and BENJAMIN STALETS, did knowingly transfer one or more identification documents, authentication features and false identification documents, to wit: identification documents which appeared to be drivers licenses and personal identification cards issued by the States of Ohio, Michigan and Utah, knowing that such identification documents and authentication features were produced without lawful authority, such conduct affecting interstate and foreign commerce.

All in violation of Title 18, United States Code, Sections 1028(a)(2) and 2.

COUNT 3

The Grand Jury further charges:

From on or about June 18, 2013 to on or about February 6, 2018, in the Northern District of Ohio, Western Division, and elsewhere, Defendants, MARK ALEX SIMON, SARAH MARIE ALBERTS, AARON KUNS and BENJAMIN STALETS, did knowingly possess, with the intent to use and transfer unlawfully, five or more identification documents (other than those issued lawfully for the use of the possessor), authentication features and false identification documents, to wit: false identification documents which appeared to be drivers licenses and personal identification cards issued by the States of Ohio, Michigan and Utah, such conduct

affecting interstate and foreign commerce.

All in violation of Title 18, United States Code, Sections 1028(a)(3) and 2.

COUNT 4

The Grand Jury further charges:

From on or about June 18, 2013 to on or about February 6, 2018, in the Northern District of Ohio, Western Division, and elsewhere, Defendants, MARK ALEX SIMON, SARAH MARIE ALBERTS, AARON KUNS, and BENJAMIN STALETS, did knowingly produce, transfer and possess one or more document-making implements and authentication features with the intent that such document-making implements and authentication features be used in the production of false identification documents, to wit: false identification documents which appeared to be drivers licenses and personal identification cards issued by the States of Ohio, Michigan and Utah, such conduct affecting interstate and foreign commerce.

All in violation of Title 18, United States Code, Sections 1028(a)(5) and 2.

FORFEITURE

The Grand Jury further charges:

The allegations contained in Counts 1 through 4 of this Indictment are hereby re-alleged and incorporated by reference as if fully set forth herein for the purpose of alleging forfeiture pursuant to the provisions of 18 U.S.C. § 982(a)(2)(B). As a result of these offenses, MARK ALEX SIMON, SARAH MARIE ALBERTS, AARON KUNS, and BENJAMIN STALETS, the defendants herein, shall forfeit to the United States any and all property constituting, or derived from, proceeds the defendants obtained, directly or indirectly, as the result of such violations;

including, but not limited to, the following:

- a.) 500.09060833 bitcoins (valued at \$5,105,772.00 on February 23, 2018) seized on or about February 7, 2018, from MARK ALEX SIMON.
- b.) .23163977 bitcoins (valued at \$2,364.97 on February 23, 2018) seized on or about February 14, 2018, from MARK ALEX SIMON.
- c.) .00038763 bitcoins (valued at \$3.96 on February 23, 2018) seized on or about February 14, 2018, from MARK ALEX SIMON.
- d.) .09190918 bitcoins (valued at \$938.36 on February 23, 2018) seized on or about February 14, 2018, from MARK ALEX SIMON.
- e.) .16670551 bitcoins (valued at \$1,702.01 on February 23, 2018) seized on or about February 14, 2018, from MARK ALEX SIMON.
- f.) 1.85924344 bitcoins (valued at \$18,982.31 on February 23, 2018) seized on or about February 13, 2018, from AARON KUNS.
- g.) .00128912 bitcoins (valued at \$13.16 on February 23, 2018) seized on or about February 13, 2018, from AARON KUNS.
- h.) \$8,337.00 in U.S. Currency seized on February 6, 2018, at the Stengel Avenue, Toledo, Ohio, residence of MARK SIMON.
- i.) Suisse 250 gram silver bar (valued at \$138.00) seized on February 6, 2018, at the Stengel Avenue, Toledo, Ohio, residence of MARK SIMON.
- j.) (2) Scotia Bank 1oz. platinum silver bars (valued at \$974.00 each) seized on February 6, 2018, at the Stengel Avenue, Toledo, Ohio, residence of MARK SIMON.

k.) (3) Suisse 1oz. platinum silver bars (valued at \$974.00 each) seized on February 6, 2018, at the Stengel Avenue, Toledo, Ohio, residence of MARK SIMON.

l.) 1oz. Buffalo gold coin (valued at \$1,361.00) seized on February 6, 2018, at the Stengel Avenue, Toledo, Ohio, residence of MARK SIMON.

m.) (2) 1oz. Kangaroo gold coins (valued at \$1,346.00 each) seized on February 6, 2018, at the Stengel Avenue, Toledo, Ohio, residence of MARK SIMON.

n.) Heraeus 100 gram gold bar (valued at \$4,247.50) seized on February 6, 2018, at the Stengel Avenue, Toledo, Ohio, residence of MARK SIMON.

o.) (2) Austria Philharmonic 1oz. gold bars (valued at \$1,346.00 each) seized on February 6, 2018, at the Stengel Avenue, Toledo, Ohio, residence of MARK SIMON.

p.) Suisse 1 gram gold bar (valued at \$42.50) seized on February 6, 2018, at the Stengel Avenue, Toledo, Ohio, residence of MARK SIMON.

q.) China 1/10oz. panda gold coin (valued at \$132.00) seized on February 6, 2018, at the Stengel Avenue, Toledo, Ohio, residence of MARK SIMON.

r.) Commemorative Copper Bitcoin (no value) seized on February 6, 2018, at the Stengel Avenue, Toledo, Ohio, residence of MARK SIMON.

s.) (20) John Gault 1oz. silver rounds (valued at \$17.15 each) seized on February 6, 2018, at the Stengel Avenue, Toledo, Ohio, residence of MARK SIMON.

t.) (195) Canada 1oz. silver Maple Leaf coins (valued at \$19.40 each) seized on February 6, 2018, at the Stengel Avenue, Toledo, Ohio, residence of MARK SIMON.

u.) (130) Canada 1oz. gold Maple Leaf coins (valued at \$1,346.00 each) seized on

February 6, 2018, at the Stengel Avenue, Toledo, Ohio, residence of MARK SIMON.

v.) (15) Pamp 1oz. gold bars (valued at \$1,346.00 each) seized on February 6, 2018, at the Stengel Avenue, Toledo, Ohio, residence of MARK SIMON.

w.) (6) 1oz. Eagle gold coins (valued at \$1,361.00 each) seized on February 6, 2018, at the Dewlawn Avenue, Toledo, Ohio, residence of AARON KUNS.

x.) (6) 1oz. Canada Maple Leaf coins (valued at \$1,346.00 each) seized on February 6, 2018, at the Dewlawn Avenue, Toledo, Ohio, residence of AARON KUNS.

y.) (11) Pamp 1oz. gold bars (valued at \$1,346.00 each) seized on February 6, 2018, at the Dewlawn Avenue, Toledo, Ohio, residence of AARON KUNS.

z.) (2) 1oz. Pamp gold bars (valued at \$1,346.00 each) seized on February 6, 2018, at the Valley Bluff, Perrysburg, Ohio, residence of SARAH ALBERTS.

aa.) (12) 1oz. Canada gold Maple Leaf coins (valued at \$1,346.00 each) seized on February 6, 2018, at the Valley Bluff, Perrysburg, Ohio, residence of SARAH ALBERTS.

bb.) \$276.00 in U.S. Currency seized on February 6, 2018, at the Valley Bluff, Perrysburg, Ohio, residence of SARAH ALBERTS.

A TRUE BILL.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.